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October 25, 2012

VIA ECF

The Honorable Judge Roslynn R. Mauskopf
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Akiva Zafir, as Trustee of Anna Zafir 2006YI Irrevocable Life Insurance Trust, dated March 1, 2006 v. John Hancock Life Insurance Company (U.S.A.), Docket No. 12-cv-05086-RRM-JO*

Dear Judge Mauskopf:

This firm represents defendant John Hancock Life Insurance Company (U.S.A.) (“John Hancock”) in the above-referenced action. This action was originally filed in New York State Supreme Court, Kings County. John Hancock accepted service of the Complaint on October 5, 2012 (the “Complaint”). John Hancock subsequently removed this action to this Court on October 10, 2012, making October 25, 2012 the deadline for John Hancock to answer the Complaint.

The Parties have conferred and agreed to extend John Hancock’s time to answer, or otherwise respond, to the Complaint from October 25, 2012, to November 26, 2012. We respectfully request that Your Honor Order John Hancock’s deadline to answer or otherwise respond to the Complaint is November 26, 2012.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Sean R. Flanagan

Sean R. Flanagan

cc: Avi Rosengarten, Esq. (via email & ECF)